

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** ) **Case No.** 22-21412-GLT  
Kathleen T. Meinert, )  
    **Debtor,**                  ) **Chapter 13**  
Kathleen T. Meinert, )  
    **Movant,**                 )  
    **vs.**                        )  
PNC Bank, N.A. and Ronda J. )  
Winneccour, Chapter 13 Trustee )  
    **Respondents.**           ) **Document No.**

**DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT  
CHANGE FILED ON APRIL 10, 2023**

**AND NOW**, come the Debtor, Kathleen T. Meinert, by and through her attorneys, Calaiaro Valencik and David Z. Valencik, and present the following Declaration regarding the Notice of Mortgage Payment Changes filed on April 10, 2023:

1. Kathleen T. Meinert (the “Debtor”) filed an emergency Chapter 13 bankruptcy on July 27, 2022, at Case No. 22-21412 GLT.
2. PNC Bank, N.A. (hereinafter “PNC”) holds a home equity line of credit on the property at 128 Crystal Springs Drive, Cranberry Township, Pennsylvania 16066.
3. PNC filed Notice of Mortgage Payment Change (“NMPC”) on April 10, 2023. The April 10, 2023 NMPC proposed to increase the payment to PNC by \$26.49 due to a change in the interest rate.
4. The Debtor filed an Amended Chapter 13 Plan on September 9, 2022.
5. The Amended Plan provides for the property at 128 Crystal Springs Drive, Cranberry Township, Pennsylvania 16066 be sold.
6. Upon sale of the property, PNC will be paid from the proceeds of the sale.
7. There is a contested hearing on the Amended Plan dated September 9,

2022 scheduled on May 9, 2023. The contested hearing was requested by the Trustee due to lack of progress with listing the property for sale and the Debtor's lack of communication with Counsel.

**Respectfully Submitted,**

**Date:** May 1, 2023

BY: /s/ David Z. Valencik  
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